

Southwestern Bell

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 7, 1992

ORIGINAL
FILE

Richard C. Hartgrove
General Attorney

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Dear Bill:

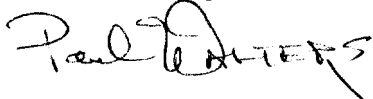
Re: Comments of Southwestern Bell Telephone Company,
RM-7990

Enclosed please find an original and five (5) copies of the above-referenced pleading to be filed with the Secretary of the Commission on Wednesday, July 8, 1992.

Additional copies of the pleading are attached to be used as courtesy copies and one is included for your files.

Please call to confirm that the pleading has been filed.
Thank you for your assistance.

Very truly yours,



(f) Richard C. Hartgrove

Enclosure

1010 Pine Street
St. Louis, MO 63101

Phone 314 235-2506

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JUL - 8 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF
SOUTHWESTERN BELL TELEPHONE COMPANY

³ Petition For Clarification And Modification, p. 1.

I. INTRODUCTION

SWBT generally supports the position taken by the NAAG which seeks to: (a) apply pay-per-call rules to such services offered over standard inward WATS (800 Number) Services; and (b) preclude interexchange carriers (IXCs) from providing standard inWATS service where consumers are billed by the use of either tone generation technology, automatic number identification (ANI), or billing detail information. Furthermore, SWBT requests that the FCC issue rules prohibiting the use of any service (700, 800, 900, etc.) to obtain information used to automatically generate a reverse charge (collect) call-back to the original calling party, where the collect call is for the purpose of providing and billing a pay-per-call service.

SWBT has experienced complaints similar to those documented in the NAAG Petition For Clarification or Modification. SWBT agrees with the conclusions drawn by the NAAG and supports the recommendations made in the proposed rulemaking. SWBT adds the following concerns to the NAAG Petition to further support the need for additional Commission action.

II. THE TOLL FREE NATURE OF 800 SERVICE MUST BE PROTECTED.

Few things are as widely accepted as the toll free nature of 800 Service. Years of advertising by businesses throughout the country have cultivated this image. Consumers feel confident that no surprises will arise when placing calls to 800 numbers. It is this comfort and confidence that many businesses rely on. This is a perception that must be protected. Allowing pay-per-call

providers to automatically bill consumers for calls placed to 800 numbers will undermine the 800 industry by causing caution and confusion in the calling public's mind. It is not unlikely that consumers, and even state commissions, will begin to consider 800 Service and 900 Service as one in the same. Should this happen, the result could be devastating to consumers and conventional 800 subscribers. In the worst case, state commissions, in response to consumer complaints, could order local exchange companies to include 800 service in existing pay-per-call end user blocking packages. Consumers would suffer through the loss of access to the myriad of valuable 800 services. Throughout the nation, many businesses who depend heavily on their 800 numbers, would suffer through the loss of customers.

The FCC must recognize that the public interest would not be served by allowing the reputation of, and potentially the future of, 800 Service to be jeopardized by a small group of pay-per-call providers who seek to generate revenues by offering services in a manner that confuses and, in many cases, deceives the public. Certainly, if the programs are of value, they could be provided via the more conventional pay-per-call dialing plans, such as 900 or 976.

The Commission must issue rules that prevent IXCs from providing 800 numbers to pay-per-call providers. Also, pay-per-call providers must be prohibited from using existing 800 numbers to offer pay-per-call services for which the calling party is automatically billed, whether the billing information is obtained via tone generation technology or ANI. SWBT agrees with the NAAG,

however, that this restriction should not apply when the calling party provides a revolving credit card number to the IXC or pay-per-call provider for billing.

III. THE FCC MUST PROHIBIT REVERSE CHARGE CALLS IN CONNECTION WITH PAY-PER-CALL SERVICES.

A new method of offering pay-per-call services has recently arisen. The pay-per-call provider advertises a program that can be accessed via a "toll free" 800 number. Upon placing the call, the consumer is informed that charges will apply and that the caller can hang up without incurring those charges. The caller is then instructed to hang up. Within approximately one minute, the original caller receives an incoming call from an automated operator service.⁴ The automated operator instructs the consumer to enter a "1" on the touch tone pad to accept the "collect call" charges, or to hang up. If the consumer enters the "1", the call is then transferred to the pay-per-call program and billing begins. The charges for the call will appear on the consumer's monthly telephone bill as a normal collect call from a POTS (plain old telephone service) number. The only unusual appearance of the line on the bill is the magnitude of the charge. Normally, these charges are \$1.00 or more per minute.

The above practice does not comport with the FCC's intention in CC Docket No. 91-65 of reducing consumer confusion.

⁴ The pay-per-call provider utilizes ANI digits captured during the initial call to the 800 number to generate a call-back as a collect call.

The use of an 800 number to initiate the calling process, coupled with the subsequent collect call call-back, is in fact greatly confusing to the public. Attachment A is a formal letter of complaint to the Commission regarding this type of call.

To reduce public confusion and controversy, the Commission should prohibit IXCs and pay-per-call providers from using tone generation technology or ANI to generate reverse charge collect calls. If such pay-per-call programs are of value, they can be offered via conventional pay-per-call dialing plans (900, 976, etc.).

Many consumers who have taken steps to control the use of their telephone through pay-per-call blocking or toll restriction are helpless to prevent charges incurred when an 800 number is dialed. The consumer is subsequently billed for calls to 900 numbers or fabricated messages that appear to be DDD (direct distance dialing) calls to POTS (plain old telephone service) numbers. The restrictions placed on the line are actually functioning properly, yet the IXC has circumvented the billing party's wishes by creating a message that would have been blocked in order to bill for calls to 800 numbers.

Furthermore, the LEC is blamed by the consumer for failure to provide blocking or toll restriction and incurs additional expense verifying the services are functioning properly. As previously stated, SWBT believes 800 restriction would not be in the public interest. The IXC should not be allowed to use 800 numbers for pay-per-call services, in order to circumvent the customer's right to block or restrict calls.

IV. CONCLUSION

SWBT supports both the NAAG and the Commission in establishing guidelines allowing for the open, honest, and straightforward provision of valuable pay-per-call services. These services should be distinguished from the confusing and sometimes deceitful techniques of a limited number of providers. Regulations should be established that, while allowing valuable pay-per-call services to flourish, do not allow the destruction of the reputation of 800 Service.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By



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July 8, 1992

REV. 1/17/92

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JULIE L. PREWITT
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 (816) 361-7335
 (816) 523-8200 DAY PHONE

March 26, 1992

Chief
 Formal Complaints & Public Inquiries Board
 Federal Communications Commission
 Room 6202
 Washington, DC 20554

Re: 1-800-288-3825; perhaps others; Zero Plus Dialing, Inc.
 and Integretel, Inc., Pilgram Telephone and Southwestern Bell
 (Kansas).

Dear Sir or Madam:

I wrote previously concerning this matter, and wish to provide further information.

I am writing concerning the above telephone number. It came to my attention when I received my bill this month for telephone service. There were numerous calls on my number which were collect from the number 1-617-864-4939 and billed through the long distance companies Integretel, Inc. and Zero Plus Dialing, Inc.

Apparently, one calls the above referenced 800 number, which is a free call, and then, after calling, the line calls your number back, collect, and indicates that you are to press "1" if you wish to accept the charges. I found when I tried this myself this evening, that after you press the "1", there is a message which I believe is misleading stating that the charges are \$1.00 per minute and then states that you are to disregard all charges, that those are for local customers only.

These 800 calls were placed by my 13 year old daughter and her 12 year old friend. I do not know where the 12 year old friend got the 800 number. However, I do know that the calls are for "phone sex". The 800 message does indicate that if you are below 18, you should hang up.

My primary question regarding this matter: Is this legal? Minors are not allowed to browse an adult book store or purchase

liquor.

I also would like information on my rights regarding the charges. I do not feel that I should have to pay for "phone sex" which was sold to my daughter and her friend in what I feel is an illegal manner.

Since writing your office before, I have contacted these phone companies (Zero Plus Dialing, Inc. and Integretel, Inc.) by phone. I have heard from them, and from Southwestern Bell (the local company in our area), several different versions of an explanation which indicates that I have no right to dispute these charges for any reason, and that I must contact PDQ Phone, which was given to me to have an address at One Kendall Square, Building 600, Cambridge, MA 02139.

I have therefore sent registered letters to PDQ Phone at that address, to Integretel at P.O. Box 611987, San Jose, CA 95161-1987 and to Zero Plus Dialing at 9311 San Pedro, Suite 300, San Antonio, TX 78217. These letters indicate that I dispute the validity of these charges.

My understanding from talking with one of the attorneys with Southwestern Bell is that I do have the right to demand that these companies send a notice to Southwestern Bell indicating that I have disputed these charges with them, and that if that is done, Southwestern Bell is not to cut off my phone service for failure to pay these particular charges on my bill.

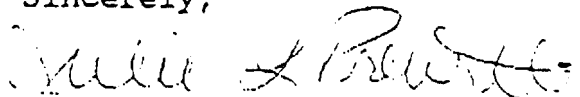
I was told by Southwestern Bell that they must bill for these companies, and assess the late charge, that I would have to contact Integretel and Zero Plus Dialing directly to have any chance of getting these charges taken off the bill. Integretel and Zero Plus Dialing tell me that they are not long distance companies, but are "billing clearing house services" and they do not have any dealings with customers about complaints, so I should contact PDQ Phone, which has the same address as Pilgrim Telephone.

I certainly do not believe that I should be required to go to such trouble to dispute a bill I received when I had never heard of this PDQ phone company, never knew that there was any sort of thing available to the public in general and minors in particular, and never agreed to do business with any of these companies.

I would appreciate any information you can provide me regarding this matter.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie L. Prewitt".

Julie L. Prewitt

Prewitt
1217 W. 70th Street
KOMO 64113

RECORDED

INDEXED

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CERTIFICATE OF SERVICE

I, Dawn Lingenfelter, hereby certify that the foregoing "Comments of Southwestern Bell Telephone Company" in Docket No. RM-7990, has been served this 8th day of July, 1992 to the Parties of Record.


Dawn Lingenfelter

July 8, 1992

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